

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

LOUISIANA HEALTH SERVICE & INDEMNITY
COMPANY D/B/A BLUE CROSS AND BLUE SHIELD
OF LOUISIANA, and HMO LOUISIANA, INC., on
behalf of themselves and all others similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,
INC., JANSSEN RESEARCH & DEVELOPMENT,
LLC, and BTG INTERNATIONAL LIMITED,

Defendants.

CIVIL ACTION NO. 1:19-cv-00474

MAYOR AND CITY COUNCIL OF BALTIMORE, on
behalf of itself and all others similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,
INC., JANSSEN RESEARCH & DEVELOPMENT,
LLC, and BTG INTERNATIONAL LIMITED,

Defendants.

CIVIL ACTION NO. 1:19-cv-00605

IRON WORKERS DISTRICT COUNCIL
(PHILADELPHIA and VICINITY) HEALTH BENEFIT
PLAN, on behalf of itself and all those similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,
INC., JANSSEN RESEARCH & DEVELOPMENT,
LLC, and BTG INTERNATIONAL LIMITED,

Defendants.

CIVIL ACTION NO. 1:19-cv-00642

KENTUCKY LABORERS DISTRICT COUNCIL
HEALTH AND WELFARE FUND, on behalf of itself
and all those similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,
INC., JANSSEN RESEARCH & DEVELOPMENT,
LLC, and BTG INTERNATIONAL LIMITED,

Defendants.

CIVIL ACTION NO. 1:19-cv-00658

PLAINTIFFS' MOTION FOR CONSOLIDATION

Counsel for plaintiffs Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana, HMO Louisiana, Inc., the Mayor and City Council of Baltimore, Iron Workers District Council (Philadelphia and Vicinity) Health Benefit Plan, and Kentucky Laborers District Council Health and Welfare Fund hereby move, pursuant to Federal Rule of Civil Procedure 42(a), for the consolidation of four cases recently filed in this district on behalf of a proposed class of purchasers of the drug Zytiga (abiraterone acetate) and its A/B-rated generic equivalent.¹

In support of this motion, the Plaintiffs file herewith a memorandum of law and a proposed order.

Dated: May 31, 2019

Respectfully submitted,

/s/William H. Monroe, Jr.

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¹ This motion is being separately filed in each of the four related cases.

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**Pro hac vice* motions pending

*Counsel for Plaintiff Kentucky Laborers District
Council Health and Welfare Fund and the Proposed
Class*

CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record who have made a formal appearance.

Dated: May 31, 2019

/s/ William H. Monroe, Jr.

William H. Monroe, Jr. (VSB No. 27441)